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POLICY BRIEF

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Uganda manufacturer's perception regarding product standards enforcement by UNBS

Executive Summary

Although the Uganda National Bureau of Standards (UNBS) has established processes for operations, assessment and enforcement of standards to improve product quality, this study established that manufacturers have mixed views on the effectiveness of standards enforcement processes. Perceptions regarding the approaches to enforce standardisation were rated as 'less effective', but conformity assessment and metrology-related activities were rated as 'effective', despite the complexity of standards as a challenge. We recommend that there should be a regular evaluation of standards-related laws and regulations, increased training and staffing of UNBS, simplification of standards for easy interpretation and implementation, and empowering local authorities to support UNBS in enforcing standards.

Introduction

Although Uganda has endeavoured to develop the quality of its standards infrastructure, it is yet to reach its full potential, especially in responding to the envisaged Import Replacement Strategy (IRS). An effective IRS requires a strengthened legal and institutional framework for standards to support manufacturing. Currently, Uganda has 3,600 compulsory and voluntary standards, which may be updated or withdrawn with new product developments. However, the current state suggests that formulation and implementation processes remain slow, and the national capacity is still inadequate to implement standards fully. This is because this process requires scientific, technical and legal expertise and sufficient infrastructure such as the laboratories to operate optimally[1]. In addition, inferior quality and fake manufactured products limit sector performance as they out-compete genuine products.

Choi *et al.* (2014) posit that "a nation should establish and implement processes for effective and efficient operation of the standards system." UNBS established processes for operations, assessment and enforcement of standards to improve product quality; which are built around the Standardisation, Conformity Assessment, Metrology and Accreditation practices. Particularly the processes for enforcing standards compliance, assessment and ensuring accuracy when conducting metrology activities.

As Uganda embarks on the IRS envisaged in the National Development Plan III, developing the quality of the nation's standards infrastructure is critical. A recent study, '***Does Uganda have the necessary manufacturing standards framework to pursue the NDP III's import substitution strategy***?' employed the National Standards Capability Assessment Framework (NSCAF) to assess Uganda's readiness to manufacture and later export quality and competitive commodities. Under this framework, the three pillars of standards, standardisation, conformity assessment and metrology are analysed under seven assessment categories; laws, systems and institutions, strategies and implementation plans, stakeholders, infrastructure, human resources, processes and outcomes. The brief examines whether the established procedures in product standards enforcement in Uganda are adequate, especially in pursuit of NDP III's IRS.

Data and methodology

The brief uses data from the study mentioned above, which relied on a multi-pronged approach, including desk review, qualitative and quantitative methods, to assess the framework of the national standards.

Findings

Standardisation: process for the operation of the standards system

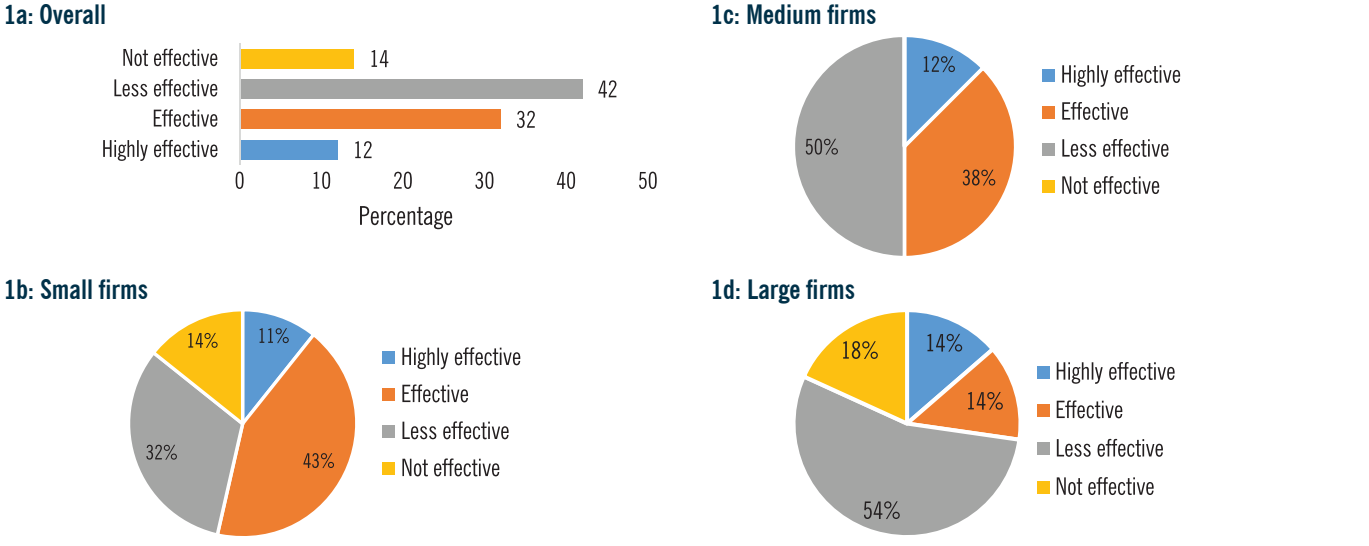
Currently, UNBS enforces three (3) types of standards, which are national (Uganda standards [US]), regional (harmonised EAC standards [EAS]), and international standards (ISO). Product standards cost between Ugx. 10 000 to Ugx. 110,000 and can be updated or withdrawn with new product developments[2]. KIIs reveal that for inspection, small and micro firms are the most disadvantaged because when UNBS randomly attempts to pick samples or inspect the production process, the responsible managers are usually absent. There are also cases where the production of sub-standard commodities is done at unknown locations, the products are put on the market, and the production premises are closed, before authorities are alerted. Lastly, market surveillance is challenged by understaffing, which affects inspection, especially at the borders. Out of the about 79 borders, UNBS staff are fully present at less than 20 border entry points.

Forty-two percent of manufacturers rate the effectiveness and efficiency of the processes for operating the standards system, such as identifying non-compliant manufacturers and punitive action taken as 'less effective' (Figure 1a). This is suggestive of manufacturers' low confidence (mainly large and medium) in the process mentioned above. Most firms complained the Bureau was ineffective in identifying counterfeiters and punishing them. They were unaware that this is a core function of the Uganda Registration Services Bureau since UNBS mainly handles sub-standard commodities. Small firms especially complain of challenges in the certification process. In addition, manufacturers complain that laws and policies fail because the punitive actions are not commensurate to elicit deterrence.

Conformity Assessment: processes for assessment, auditing and certification

To achieve standardisation, UNBS conducts conformity assessments under the Product Certification Scheme. This process involves the testing of products of a registered manufacturer to ensure conformity to required standards. After they evaluate the product samples in accredited laboratories, they are certified and issued a Quality Mark (Q-mark).[1] To ensure that products on the markets conform to stipulated standards, UNBS conducts proactive or reactive surveillance of markets and factories. Non-conforming products are temporarily removed from the market or banned. Evidence from KIIs shows that UNBS has standard processes in place. However, challenges arise when a product cannot comply with one or two parameters in the conformity assessment test. Yet, as with any scientific test, there must be parameters that have to be fulfilled to get the certification. This challenge results from a manufacturer's poor interpretation of a standard, which elongates the assessment process. Otherwise, the assessment process is straightforward and effective when the standards requirements are understood.

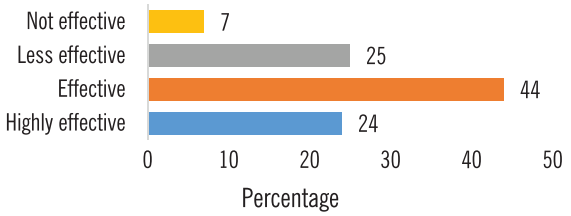
Figure 1 Effectiveness and efficiency of standards operation processes



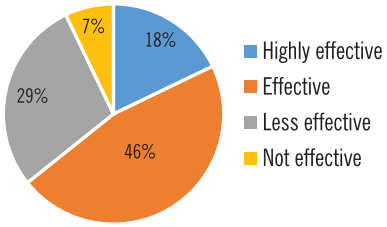
Source: Survey on standards (2021).

Figure 2 Effectiveness of processes for assessment and auditing

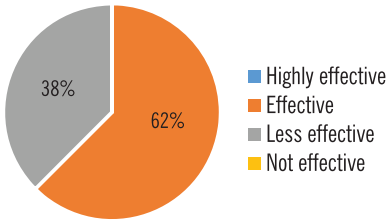
2a: Overall



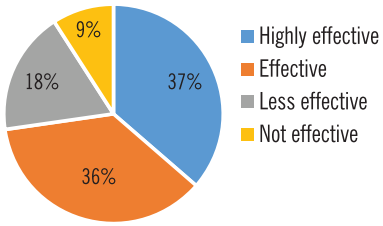
2b: Small firms



2c: Medium firms



2d: Large firms



Source: Survey on standards (2021).

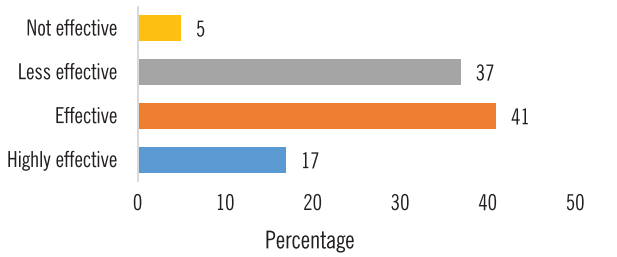
From the firm perspective, there is widespread agreement the processes for conformity assessment are effective. Forty-four percent of the manufacturers said UNBS was 'effective' (Figure 2a). Most small and medium-sized firms perceived UNBS as 'effective', while most large firms were 'highly effective'. Some manufacturers complained about the complexity of standards and difficulty understanding the requirements. This challenge is prevalent among new entrants. Also, depending on the previous compliance status of a firm, the assessment process is faster. This might explain why most large firms that have been in the system longer find the processes highly effective (figure 2d).

Metrology: process for identifying and rectifying errors in measurements

Concerning the process for identifying and rectifying measurement errors, local manufacturers have two requirements under the pre-package division — the label and the quantities. It must clearly state the declared weight or volume on the product's label. The National Metrology Laboratory is the custodian of the standards in terms of weights and ensures that if a manufacturer declares a commodity weighs one kilogram, it should be traceable to the same weight in the laboratory and align with standard weights. UNBS picks randomly samples from the manufacturing processing lines to measure the commodities' weights. If a manufacturer fails, UNBS suspends the line until they rectify the problem; otherwise, they are issued a pre-packaged report.

Most manufacturers (about 41 percent) said that the Bureau was effective. For the manufacturers that rate it as less or

Figure 3 Effectiveness of the process for identifying and rectifying errors in measurements



Source: Survey on standards (2021).

ineffective, it is likely that they do not meet the legal metrology requirements for labels and quantities of pre-packed goods because of the use of depreciated weighing machinery or unverified equipment.

Conclusion

The findings suggest manufacturers view UNBS as effective in enforcing standardisation, conducting conformity assessments and verifying metrology elements of production. They identify gaps in the enforcement processes, such as understaffing, particularly at border posts; local authorities are unaware of secret production locations; poor interpretation of standards and requirements for conformity by manufacturers.

Manufacturers had mixed views on the effectiveness of standards enforcement processes. They rated processes to enforce standardisation as 'less effective'. This is because of a non-deterrent punitive regime for errant manufacturers

and the continued prevalence of sub-standard products on the market. However, conformity assessment processes and those enforcing metrology were rated as 'effective', despite the complexity of standards as a challenge.

Policy recommendations

- Regular evaluation of laws and regulations to address gaps in enforcement of standards, particularly when punishing errant manufacturers. This could consequently boost the effectiveness of firms in their operations.
- Increase training and staffing of UNBS to address human resource gaps. This will enable it to execute its mandate – especially at border points fully.
- Simplify standards so that manufacturers (specifically new entrants) easily understood and implemented them to encourage them to join manufacturer associations and networks to access information from their peers easily.
- Empower the local authorities to support UNBS in enforcing standards. Build the capacity of the lower local government authorities about standardisation and the related processes so that they can detect violations and report the culprits.

References

1 UNCTAD. (2020). Uganda science, technology & innovation policy review. New York.
2 Uganda National Bureau of Standards. (2020a). Standards catalogue, June 2020 https://unbs.go.ug/content.php?src=information-resource-center&pg=content

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